IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND NORTHERN DIVISION

RANDOLPH SCOTT)	
Plaintiff,)	Civil Action No.: 1:09-cv-03110
v.)	
NUVELL FINANCIAL SERVICES LLC, et al.)	
Defendants.)	
)	

DEFENDANTS NUVELL FINANCIAL SERVICES LLC AND NUVELL NATIONAL AUTO FINANCE LLC'S STATEMENT IN RESPONSE TO COURT'S STANDING ORDER CONCERNING REMOVAL

Defendants Nuvell Financial Services LLC and Nuvell National Auto Finance LLC, by and through their undersigned attorneys, hereby respond to the Court's Standing Order Concerning Removal (the "Standing Order") issued on November 23, 2009, and in support thereof state as follows:

- Defendants were served with a copy of the Summons and Complaint on October
 23, 2009.
 - 2. Neither Defendant is a citizen of the State of Maryland.
- 3. Defendants removed this case on November 20, 2009, within thirty (30) days of service of the Summons and Complaint.
- 4. This action was commenced in the Circuit Court for Baltimore County, Maryland on September 24, 2009, less than one year before the date of removal.
 - 5. There are no other defendants in this action.

6. Contemporaneous with the filing of this Statement, Defendants will serve a copy of the Standing Order on John J. Roddy and Elizabeth A. Ryan, counsel for Plaintiff who are not registered to receive electronic notification of filings in this case.

Dated: December 7, 2009 Respectfully submitted,

Kimberly A. Manuelides (Bar No. 23726) Geoffrey M. Gamble (Bar No. 28919) SAUL EWING LLP 500 E. Pratt Street, Suite 800 Baltimore, Maryland 21202 (410) 332-8848 (telephone) (410) 332-8115 (facsimile) kmanuelides@saul.com (email) ggamble@saul.com (email)

Attorneys for Defendants Nuvell Financial Services LLC and Nuvell National Auto Finance LLC.

1043504.1 12/7/09 -2-

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of December, 2009, I electronically filed the foregoing Statement in Response to the Court's Standing Order Concerning Removal by using the CM/ECF system which will send a notice of electronic filing to the following:

Martin Eugene Wolf mwolf@quinnlaw.com

Mark Harris Steinbach writemhs@gmail.com

Benjamin Howard Carney bcarney@quinnlaw.com

Attorneys for Named Plaintiff and the Class

A copy of the foregoing Statement in Response to the Court's Standing Order Concerning Removal and the Standing Order Concerning Removal was sent via first-class mail, postage-prepaid on this 7th day of December, 2009 to:

John J. Roddy Elizabeth A. Ryan RODDY, KLEIN & RYAN 727 Atlantic Avenue, 2d Floor Boston, Massachusetts 02111

Attorney for Named Plaintiff and the Class

Geoffrey M. Gamble	

1043504.1 12/7/09 -3-